1 Thomas M. Downey, State Bar No. 142096 Derek H. Lim, State Bar No. 209496 2 **BURNHAM BROWN** A Professional Law Corporation 3 P.O. Box 119 Oakland, California 94604 4 1901 Harrison Street, 11th Floor 5 Oakland, California 94612 Telephone: (510) 444-6800 6 Facsimile: (510) 835-6666 7 E-Mail: tdowney@burnhambrown.com dlim@burnhambrown.com 8 Attorneys for Defendant 9 RITE AID CORPORATION 10 UNITED STATES DISTRICT COURT 11 12 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION 13 SALWA SANANY ALAUBALI and No. C-06-05787 SBA (JCS) BARAKA SANANY, as Guardian ad 14 Litem for BASIL ALAUBALL, a minor, STIPULATION AND ORDER TO AMIRAH ALAUBALI, a minor, and CONTINUE EXPERT DISCLOSURE BADER ALAUBALI, a minor. 15 DEADLINE AND EXPERT DISCOVERY CUT-OFF DATE Plaintiffs. 16 Complaint Filed: July 14, 2006 17 Trial Date: December 3, 2007 RITE AID CORPORATION, a Delaware 18 corporation and DOES 1 through 10, inclusive. 19 Defendants. 20 21 22 Plaintiffs Salwa Sanany Alaubali; Baraka Sanany (Guardian ad Litem); Basil Alaubali; 23 Amirah Alaubali; and Bader Alaubali ("Plaintiffs") and Defendant Rite Aid Corporation ("Defendant") hereby stipulate by and through their undersigned counsel of record to continue 24 the following expert discovery deadlines in the above matter: 25 26 27 28 STIPULATION AND ORDER TO CONTINUE EXPERT DISCLOSURE No. C-06-05787 SBA (JCS)

DEADLINE AND EXPERT DISCOVERY CUT-OFF DATE

1	<u>Event</u>	Current Deadline	Proposed Deadline
2	Expert disclosures	September 1, 2007	September 18, 2007
3	Expert discovery cut-off	September 30, 2007	October 9, 2007
4	The remaining dates in the Court's January 10, 2007 Scheduling Conference Order and		
5	June 14, 2007 Order continuing certain dates will remain intact.		
6	The parties have been diligently proceeding with discovery in this matter. A continuance		
7	of the aforementioned dates is requested because the expert disclosure deadline is currently set		
8	for September 1, prior to the close of discovery on September 15. For purposes of judicial		
9	economy and efficiency, the parties seek to continue the date to disclose experts until after the		
10	close of discovery. Further, the parties seek to extend the date to complete expert discovery.		
11	The parties anticipate that this will reduce the need for supplemental disclosures.		
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13	DATED: August <u>7/</u> , 2007	BURNHAM I	BROWN
14			
15	· ·	ĐEREK H. LI	M. S.
16		Attorneys for	Defendant
17		RITE AID CC	PRPORATION
18	21		
19	DATED: August 21, 2007	NISSENBERG	G & ASSOCIATES
20		(-	(4)
21		DAVID N.	NISSENBERG
22		Attorneys f SALWA SA	or Plaintiffs ANANY ALAUBALI and BARAKA
23		SANANY.	as Guardian ad ASIL ALAUBALI, a minor,
24		AMIRAH A ALAUBAL	ALAUBALI, a minor, and BADER
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ORDER

Having reviewed the STIPULATION AND ORDER TO CONTINUE EXPERT DISCLOSURE DEADLINE AND EXPERT DISCOVERY CUT-OFF DATE, and good cause appearing therefore, IT IS HEREBY ORDERED:

That Expert Disclosures will now take place on September 18, 2007, and the Expert Discovery Cut-off will now be October 9, 2007. The remaining dates identified in the Court's January 10, 2007 Scheduling Conference Order and June 14, 2007 Order continuing certain dates shall remain intact.

DATED: 9/4/07

United States District Court Judge